

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

THE TRUSTEES OF  
PURDUE UNIVERSITY,

PLAINTIFF,

v.

STMICROELECTRONICS N.V., ET AL.,

DEFENDANTS.

Case No.: 21-CV-00727

**JOINT MOTION RE THIRD PARTY SUBPOENA**

Plaintiff requested that certain third parties subpoenaed by Defendants, namely Purdue Research Foundation, Professor James A. Cooper, Dr. Asmita Saha, and Bahret & Associates (collectively, the “Purdue Affiliated Parties”) be considered for the purposes of discovery as part of, or in privity with Plaintiff. The Court held a hearing on January 28, 2022, and entered an agreed order on February 3, 2022 [ECF No. 64]. In addition to the Purdue Affiliated Parties, STMicroelectronics, Inc. also subpoenaed the law firm of Barnes & Thornburg LLP. In accordance with the Court’s prior rulings, Plaintiff and Barnes & Thornburg hereby stipulate that (1) Plaintiff has full and complete control over all relevant documents and materials in the possession, custody, and control of Barnes & Thornburg as well as the ability to present Barnes & Thornburg for a deposition, and (2) Barnes & Thornburg agrees to have all disputes related to discovery sought from them by STMicroelectronics, Inc. in connection with the above-styled case decided by the Judge presiding over this case, and submit themselves to the jurisdiction of this Court for such purposes. Accordingly, the parties hereby jointly move the Court for entry of an order to treat Barnes & Thornburg as a Purdue Affiliated Party.

Dated: February 23, 2022

s/ Mark D. Siegmund

Mark D. Siegmund (SBN 24117055)  
**STECKLER, WAYNE, COCHRAN,  
CHERRY, PLLC**  
8416 Old McGregor Road  
Waco, Texas 76712  
Tel: (254) 651-3690  
Fax: (254) 651-3689  
mark@swclaw.com

Alfonso G. Chan (SBN 24012408)  
Michael W. Shore (SBN 18294915)  
Halima Shukri Ndai (SBN 24105486)  
Raphael Chabaneix (SBN 24118352)  
**SHORE CHAN LLP**  
901 Main Street, Suite 3300  
Dallas, Texas 75202  
Telephone: (214) 593-9110  
Facsimile: (214) 593-9111  
achan@shorechan.com  
mshore@shorechan.com  
hndai@shorechan.com  
rchabaneix@shorechan.com

***COUNSEL FOR PLAINTIFF***

s/ Steven M. Badger

Steven M. Badger  
**BARNES & THORNBURG LLP**  
11 S. Meridian Street  
Indianapolis, Indiana 46204  
Telephone: (317) 236-1313  
Facsimile: (317) 231-7433  
steven.badger@btlaw.com

***COUNSEL FOR BARNES & THORNBURG  
LLP***

By: s/ Justin S. Cohen

**Bruce S. Sostek**  
SBN 18855700  
Bruce.Sostek@hklaw.com  
**Richard L. Wynne, Jr.**  
SBN 24003214  
Richard.Wynne@hklaw.com  
**Justin S. Cohen**  
SBN 24078356  
Justin.Cohen@hklaw.com

**Nadia E. Haghighatian**  
SBN 24087652  
Nadia.Haghighatian@hklaw.com

**HOLLAND & KNIGHT LLP**  
One Arts Plaza  
1722 Routh St., Suite 1500  
Dallas, Texas 75201  
214.969.1700

**Max Ciccarelli**  
SBN 00787242  
max@ciccarellilawfirm.com

**CICCARELLI LAW FIRM**  
100 N. 6th Street, Suite 502  
Waco, Texas 76701  
214.444.8869

**ATTORNEYS FOR DEFENDANT  
STMICROELECTRONICS, INC.**